

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

**In Re: AQUEOUS FILM-FORMING  
FOAMS PRODUCTS LIABILITY  
LITIGATION**

MDL No. 2:18-mn-2873-RMG

**This Document Relates to:**

*Brock Donnelly v. 3M Company et al.*, No. 2:20-cv-00209-RMG

*Clinton Speers & Gail Speers v. 3M Company et al.*, No. 2:21-cv-03181-RMG

*Kevin Voelker v. 3M Company et al.*, No. 2:18-cv-03438-RMG

**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Pursuant to Federal Rules of Civil Procedure 56(c) and Case Management Order Nos. 26-G, and 26-J, Defendants' Co-Lead Counsel, on behalf of the *PI Bellwether* Defendants, submit this motion for summary judgment. As set forth in the accompanying memorandum of law, Defendants are entitled to (1) judgment on and dismissal of all claims asserted by Plaintiffs for lack of causation; (2) judgment on and dismissal of Plaintiffs' strict liability claims, reflected in Counts I, II, and III of each Plaintiff's complaint; (3) judgment on and dismissal of the misrepresentation claim asserted by Plaintiff Clinton Speers, reflected in Count V of Plaintiff Speers's Complaint; and (4) judgment on and dismissal of the loss of consortium claim asserted by Plaintiff Gail Speers, reflected in Count IX of Plaintiff Speers's Complaint.

Dated: June 17, 2025

Respectfully submitted,

/s/ Brian Duffy

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*Defense Co-Leads*

**CERTIFICATE OF SERVICE**

On June 17, 2025, I electronically submitted the foregoing document with the Clerk of Court, using the electronic case filing system of the Court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Brian Duffy  
Brian Duffy